

Magistrate Judge Karen L. Strombom

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

MOBILE WORKFORCE, INC., a Delaware corporation,	)	Civil No. C05-5229 KLS
	)	
	)	
Plaintiff,	)	<b>STIPULATED MOTION FOR</b>
	)	<b>EXTENSION OF PRETRIAL</b>
v.	)	<b>DEADLINES AND ORDER</b>
	)	
PACIFIC MEDICAL, INC., a California corporation,	)	
	)	
	)	
Defendant.	)	

Pursuant to Fed. R. Civ. P. 6(b) and Local Civil Rule 16, the above-referenced parties jointly move for, and hereby stipulate to, an extension of the deadlines approved by the Court in the Order Setting Trial Dates, and Ordering Mediation dated July 20, 2005. Subject to the Court's approval, the parties hereby stipulate to the following changes in the discovery and case-management schedule for this action.

1. The current discovery deadline of March 28, 2006 shall be changed so that all of the discovery is to be completed **no later than April 25, 2006**. This four week extension is requested due to the necessary rescheduling of the February 28 and March 1, 2006 depositions of Defendant's personnel due to Plaintiff's counsel's trial schedule.

2. Three depositions of Defendant's personnel are now scheduled for April 4, 2006. This is the first available date for the deponents following the requirement to reschedule.
3. All other dates, including the trial date, set in the July 20, 2005 Order Setting Trial Dates, and Ordering Mediation are to remain as set by the Order.
4. Upon approval by the Court, **the only date to be reset will be the discovery deadline, until April 25, 2006.**

IT IS SO STIPULATED.

DATED this 16th day of March, 2006.

LINDSAY, HART, NEIL & WEIGLER, LLP      KELLER ROHRBACK, LLP

By: /s/ \_\_\_\_\_  
Edward T. Tylicki, WSBA #30082  
Attorney for Defendant  
Pacific Medical, Inc.

By: /s/ \_\_\_\_\_  
Rob J. Crichton, WSBA #20471  
Attorney for Plaintiff  
Mobile Workforce, Inc.

IT IS SO ORDERED this 20<sup>th</sup> day of March, 2006.

s/ Karen L. Strombom  
Honorable Karen L. Strombom  
U.S. Magistrate Judge

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **STIPULATED MOTION FOR  
EXTENSION OF PRETRIAL DEADLINES AND ORDER [PROPOSED]** on the following  
party:

Rob J. Crichton  
Keller Rohrback, LLP  
1201 Third Ave., Suite 3200  
Seattle, WA 98101-3052

Attorneys for Plaintiff

by mailing a true and correct copy thereof to said party on the date below.

DATED: March 16, 2006.

/s/ \_\_\_\_\_  
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Attorney for Defendant Pacific Medical, Inc